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RE: GAO follow-up responses from EPA Region 6/GAO Questions on SSSRs

Attached are the draft responses to the questions in the comments posed by GAO, in the attached spreadsheet. The numbers correspond to the site number on the spreadsheet provided by GAO (attached).

1) Eaker Air Force Base

Was this site under a RCRA order or permit at the time it was BRACed?

Yes. The facility notified EPA of its Hazardous waste site/activities in 1987.

2) Red River Army Depot

RCRA Large Quantity Generator

Any facility that generates more 1000kg of hazardous waste per month or more than 1 kg of acutely hazardous waste/month.

3) General Dynamics

What is meant by active RCRA facility?

It means the Facility was in operation at the time of Superfund investigation, and permitted/regulated under RCRA.

This facility is privately owned and government operated (POGO).

5) Cannon Air Force Base

What is meant by active RCRA facility?

It means the Facility was in operation at the time of Superfund investigation, and permitted/regulated under RCRA.

8) Hobbs Army Airfield

FUDS – Formerly Used Defense Sites

These are properties that formerly owned by, leased by, possessed by or otherwise under the operational control of DoD. These properties are now private properties or transferred to other agencies. BRAC is the lead on these sites.

9) McMullin Target Site

Visual site inspection by Navy Contractor

Visual site inspection means conducting a site visit or reconnaissance. Going to a facility or site to look around, to collect current site information or document current site conditions to write a Preliminary Assessment report. This is the initial stage of site investigation.

10) Goodfellow Air Force Base

If this is a site reassessment, where is the original assessment report? Score generated using PREscore software program. Is this common?

Site Reassessment is an action or activity code used for sites that need limited assessment to determine whether there is a need to perform further investigation. A PREscore may be requested for a site to determine if the site will score more than 28.5 which is the value necessary for NPL consideration. No, this is not common.

11) Camp Caffee

FUDS – Formerly Used Defense Sites

Same as Hobbs Army Airfield – Refer to #5

12) Camp Swift Military Reservation (UTES #3)

What is meant by “conditionally exempt small quantity generator” in RCRA info System
It means a facility that produces less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. This type of facility can only accumulate less than 1000 kg or 100 kg of spill residue of hazardous waste at any time. This what the permit allows.

14) Fort Chaffee

Installation Assessment Report = PA; Marked as No Action Needed but is this the same as NFRAP

No. But the report can be substituted for a PA.

Action Decision used by RCRA in the 1980s.

15) Naval Station Ingleside

Applied for a hazardous waste generator permit, was it granted? The PA was evaluated considering the requirements of the HRS.

Yes. The facility is currently active RCRA LQG.

17) Carswell Air Force Base

What is a SIP?

A Site Inspection Prioritization (SIP) was a site assessment action name for sites that needed re-evaluation in CERCLIS in the early 1990s, in response to the implementation of the rHRS on December 14, 1990. This may include only reviewing site files, site visit or site sampling. This has been changed to Site Reassessment.

19) New Orleans Naval Support Action

What is a SIP?

Refer to #17

20) Atlas Missile Site #9 and #4

The site is being evaluated by the COE and in the Remedial Investigation phase. The State Brownfields program is currently working with COE to complete cleanup under it's cooperate agreement.

This is a Department of Defense Superfund Memorandum of Agreement (DSMOA) between DoD and the States. DoD provides funds to States for DoD sites investigation activities.

35) Plant #3 (McDonnell-Douglas)

What is a SIP

Refer to #17

36) Randolph Air Force Base

What is a SIP

Refer to #17

37) Fuel & Lubricant Research Laboratory

Is "No I&SE – No further action deemed necessary" the same as NFRAP

No. No I&SE means No Imminent and Substantial Endangerment. Which means that there is not an immediate threat to human health and the environment. This Action Decision is used by Emergency Response/Removal Branch when it responded to a spill or release at a facility or review site files for a removal action. Department of Defense has the responsibility to respond to I&SE situations at its properties per the National Contingency Plan (NCP).

38) U.S. Air Force Melrose Range

Is "Site Evaluation Accomplished (SEA)" same as a Site Inspection?

No. Early in the 1990s, SEA was used to mean NFRAP when site investigation at a site has been completed and the site does not require further evaluation.

39) New Orleans Military Terminal

Is "Site Evaluation Accomplished (SEA)" same as a Site Inspection?

Refer to #38

42) Fort Sam Houston

Why was the site not deferred to RCRA

The site was referred to RCRA in the Discussion.

47) Barksdale Air Force Base

PREscore is next step: The prescore should reveal any data gap in targets and pathways that may require further investigation.

Site is currently a FUDS.

48) Ellington Air Force Base

No further investigation warranted. What is a SIP?

Is SEA the same as a Site Inspection?

Refer to #17 and #38

51) Dallas Naval Air Station

Only information provided "Environmental cleanup at the base is regulated by a RCRA permit issued by State (TNRCC) or TCEQ.

State cleanup site. BRAC oversight.

54) Chase Field Naval Air Station

Is SEA same as a Site Inspection or NFRAP when it is a final decision?

No

NFRAP yes, when it is a final decision.

55) Dyess Air Force Base

What is meant by active RCRA?

Active RCRA means a facility is currently in operation and handles or manages hazardous waste.

Site is currently FUDS.

56) Terrell Nike Missile Site

It is recommended that the Emergency Response Branch (ERB) review this file and comment as appropriate.

ERB is to review files and determine if there is a need for a response action. ERB does not respond to DoD sites.

57) Little Rock Air Force Base

What is meant by active RCRA? Not handled by ERB

Refer to #55. ERB does not respond to spill or releases on any DoD facility. It is the responsibility of DoD.

59) Brooks Air Force Base

Is "I&SE – No further action deemed necessary the same as NFRAP

No.

Refer to #37

62) Sheppard Air Force Base

Does SEA mean a SI was done?

No

Refer to #38

64) Corpus Christi Army Depot

Is No action needed same as NFRAP?

No

Action Decision used by RCRA in the 1980s. When Superfund was created, some site files were transferred to Superfund and entered into CERCLIS.

72) Lackland Air Force Base

Is No I&SE – No further action deemed necessary the same as NFRAP.

No

Refer to #37

32) Kelly Air Force Base

RCRA Large Quantity Generator

This site is an active RCRA facility that generates more than 1000 kg of hazardous waste.

If a facility generates more than 1000 kg per month makes them LQG